REMARKS

In the Office Action, the Examiner indicated that Claims 1 through 18 are pending in the application and the Examiner rejected all claims.

Claim Rejections, 35 U.S.C. § 103(a)

On pages 6-7 of the Office Action, the Examiner has rejected claims 1-18 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 20050014489 to Zhigang et al. ("Zhigang") in view of U.S. Patent Application Publication No. 20020078233 to Biliris et al. ("Biliris"), and further in view of U.S. Patent No. 6,590,588 to Lincke et al. ("Lincke"). This rejection is respectfully traversed.

The Present Invention

Amended claim 1 of the present application recites:

> In a device that is connectable to a server via a network, a method for providing local access to content stored on said server, comprising the steps of:
> providing said device with a combination web server and proxy (WOX) residing on the device, said WOX mirroring said server;
> whereby said WOX operates as a web server and not a proxy when processing an HTTP GET request and as a proxy and not a web server when processing an HTTP POST request.

Amended claims 7 and 13 recite similar language.

The present claimed invention recites that a device that is connectable to a server via a network is provided with a combination web server and proxy (WOX) residing on the device. (See Fig. 4). When the device attempts to communicate with a server via a network through the use of

GET requests and POST requests, those requests are processed by the WOX residing on the device. In the case of a GET command, the WOX operates as a web server and not a proxy and in the case of a POST command, the WOX operates as a proxy and not a web server. As discussed on page 12, lines 12-16 of the specification, a GET command results in WOX acting as a local web server, with content being delivered directly from the WOX on the device to the browser on the device without accessing a network via a proxy. Additionally, as discussed on page 13, lines 2-6 of the specification, a POST method is moved to the local proxy of the WOX for processing and then the HTTP POST is proxied to the enterprise server and processed without use of a local server.

Providing a WOX that resides on the device and that can operate as both a web server and as a proxy simplifies the use of a mobile device by making it transparent to a user whether the device is connected to a network or not. Content is stored both on an external enterprise server and on the WOX (operating as a local web server), so it can be provided in response to a user request whether or not the device is connected to the external enterprise server. Additionally, because the WOX can operate as a local proxy, a user can transmit data from the device's browser to the proxy whether or not the device is connected to a network. As a result, the present claimed invention provides a mobile user simplified access to web content with transparency as to whether the device is connected to a network.

U.S. Patent Application Publication No. 20050014489 to Zhigang et al.

U.S. Patent Application Publication No. 20050014489 to Zhigang et al. ("Zhigang") teaches a mobile terminal that simply acts a mobile web server. Page 4, paragraph [0042] and Fig. 3. of Zhigang teach that, in order for the mobile web server to connect to a client, the mobile terminal must connect through an WAP gateway 304 that may correspond to a conventional HTTP proxy 124 (shown in Fig. 1 of Zhigang). This allows content that is stored on the mobile terminal 302 to be accessed by an external client which can be a different mobile phone 310 or any other browser 308 connected to the internet.

U.S. Patent Application Publication No. 20020078233 to Biliris et al.

U.S. Patent Application Publication No. 20020078233 to Biliris et al. ("Biliris") teaches an architecture that distributes shares of a web content request to a plurality of content distribution networks. Specifically, Biliris teaches that "extremely popular websites on the internet often provide links to mirror sites which replicate the content at a number of locations across the globe, some closer to the particular client requesting the content" (page 1, paragraph [003]). The Examiner relies on Biliris for the alleged teaching of mirroring a network server on the WOX of the present claimed invention.

U.S. Patent No. 6,590,588 to Lincke et al.

U.S. Patent No. 6,590,588 to Lincke et al. ("Lincke") teaches a system for communicating between two devices that informs a user of the method of communication between the devices (e.g. wired, wireless, etc.) before commencing the actual communication. Specifically, Lincke teaches a Boolean variable named "post" which is set to a "1" when an HTTP POST method is used and "0" when an HTTP GET method is used (column 38, lines 52-54). Additionally, Lincke teaches that a web browser can display a user home page that is pre-loaded without sending or receiving data over the network. The Examiner relies on Lincke for the alleged teaching of a locally stored server that is accessed when no network access is available and of a WOX that operates as a web server when processing an HTTP GET request and as a proxy when processing an HTTP POST request.

The Examiner has not Established a *prima facie* Case of Obviousness

As set forth in the MPEP:

> To establish a *prima facie* case of obviousness, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skilled in the art, to modify the reference or to combine reference teachings.
> MPEP 2143

Response to Arguments

As noted above, the present claimed invention provides a device with a combination web server and proxy (WOX) that resides on the device. Because the WOX resides on the device, communication between the WOX and the device's browser (using HTTP GET and HTTP POST commands) can be done locally, without having to access any type of network. This allows a mobile user to use the device in the same way whether or not the device is connected to a network. The feature of providing a combination web server and proxy which resides on the device, on which a browser locally accesses the WOX, distinguishes the present claimed invention as novel over the prior art of record, specifically Zhigang. Additionally, the feature of the WOX operating as a web server and not a proxy when processing an HTTP GET request and as a proxy and not a web server when processing an HTTP POST request further distinguishes the present claimed invention as novel over the prior art of record.

On pages 2-4 of the Office Action, the Examiner argues that "Zhigang provides remote access to the web server and web proxy functions" and that

> Lincke discloses local access capabilities for a server type system. Local access is equivalent to accessing web server via a client system when no network access is available. (see Lincke column 14, lines 4-9)

Thus, the Examiner argues, the combination of Zhigang and Lincke discloses the capability to locally access the web server.

However, although the Examiner is correct in pointing out that Zhigang discloses only remote access to the web server, the cited passage of Lincke merely discloses that a web browser can display a user home page that is pre-loaded without sending or receiving even a single byte over the network. Displaying a pre-loaded web page in a browser, as in Lincke, is not equivalent to including an entire server on a client device. Nowhere does Zhigang or Lincke teach or suggest including an entire server locally on a client device as in the present claimed invention. And, even if the combination did suggest an entire server on a client device as asserted by the Examiner, there would be no need to then include any type of proxy functionality on the client device because there would be no need to process the commands between the browser and the server. Thus, the combination of Zhigang and Lincke does not disclose or suggest providing a device with local access to content stored on a server by providing the device with a combination web server and proxy (WOX) residing on the device, said WOX mirroring said server, as recited in each independent claim of the present invention. Biliris does not make up for this deficiency in Zhigang and Lincke.

Additionally, on pages 5-6 of the Office Action, the Examiner argues that the combination of Zhigang, Lincke and Biliris discloses the claimed limitation whereby the WOX operates as a web server when processing an HTTP GET request and as a proxy when processing an HTTP POST request. However, the Examiner cites language in Zhigang (paragraphs [0041] and [0043]) which merely disclose that the GET and POST commands are used within the invention of Zhigang. The Examiner subsequently acknowledges, on page 7, that Zhigang does not disclose operating as a web server when processing an HTTP GET request and as a proxy when processing an HTTP POST request. Nowhere does Zhigang disclose or suggest that a single proxy-server entity acts as a proxy and not a server when processing a POST request and acts as a server and not a proxy when processing a GET request.

On page 5-6 of the Office Action, in order to support the asserted combination of Zhigang, Lincke and Biliris, the Examiner subsequently mentions Lincke's disclosure that a web browser can display a pre-loaded home page as well as a teaching in Biliris of mirroring a web site. However, neither the cited portions of Lincke and Biliris nor anything else within those references has anything to do with a WOX that operates as a web server and not a proxy when processing an HTTP GET request and as a proxy and not a web server when processing an HTTP POST request as in the present claimed invention. Thus, Lincke and Biliris do not make up for the deficiencies of Zhigang.

Claim Rejections, 35 U.S.C. § 103(a)

Zhigang teaches that a mobile device can act as server so that separate, external devices are able to connect to the mobile server device over a network through a WAP gateway. The Examiner states that:

> Zhigang discloses wherein providing the device with a combination web server and proxy (WOX) residing on the device, and the capability to operate as a web server (see Zhigang paragraph [0014], lines 3-8; paragraph [0028], lines 5-9; paragraph [0031], lines 21-25: web server, web proxy; paragraph [0075], lines 5-9; paragraph [0076], lines 9-11: software, program product).

However, the cited passages in Zhigang disclose that the WAP gateway is external to the mobile client devices. Nowhere does Zhigang disclose a device that is connectable to a server via a network and that is provided with a combination web server and proxy (WOX) residing on the device, as in the present claimed invention. Thus, the invention of Zhigang suffers form the exact problem in the prior art that the present claimed invention solves, that a user cannot access content on a server with transparency as to whether the device is connected to a network or not. Neither Biliris or Lincke makes up for these deficiencies in Zhigang.

On page 7 of the Office Action, the Examiner acknowledges that Zhigang does not disclose operating as a web server when processing an HTTP GET request and as a proxy when processing an HTTP POST request. The Examiner relies on Lincke to teach this limitation. However, the cited portions of Lincke do not disclose a combination web server and proxy that operate as a web server when processing an HTTP GET command and as a proxy when processing an HTTP POST request. Rather, the cited portions of Lincke simply disclose a Boolean variable that contains the information of which type of operation is being carried out. Thus, modifying Zhigang by Lincke does not teach the claimed limitation of a combination web server and proxy that operates as a web server when processing an HTTP GET command and as a proxy when processing an HTTP POST request. Biliris does not make up for this deficiency in Lincke and Zhigang.

On page 7 of the Office Action, the Examiner also acknowledges that Zhigang does not disclose mirroring the web server. The Examiner relies on Biliris to teach this limitation and states that "one of ordinary skill in the art would have been motivated to employ the teachings of Biliris in order to enable the capability to reduce access times when content is distributed among multiple content servers." However, Biliris provides no motivation for modifying a system such as Zhigang. In contrast to the Examiner's statement, Zhigang contains no disclosure of storing content on multiple servers. Rather, the content in Zhigang is stored only on a single mobile server device. Thus, the system of Biliris cannot be properly combined with Zhigang because the there would be no motivation to modify a system with only one server to achieve a benefit that is only present when content is distributed among multiple content servers.

Accordingly, each of the independent claims (Claims 1, 7 and 13), and all claims depending therefrom, patentably define over Zhigang in view of Biliris and further in view of Lincke, and are in condition for allowance.

Conclusion

The present invention is not taught or suggested by the prior art. Accordingly, the Examiner is respectfully requested to reconsider and withdraw the rejection of the claims. An early Notice of Allowance is earnestly solicited.

Respectfully submitted,

January 8, 2008
Date

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